

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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)  
) Chapter 9  
)  
) Case No. 13-53846  
)  
) Hon. Steven W. Rhodes  
)

**CERTIFICATION OF KEARA M. WALDRON PURSUANT TO THE COURT’S ORDER  
GRANTING MOTION TO COMPEL FULL CLAWBACK OF DEBTOR’S DOCUMENT  
PRODUCTION AND RELATED RELIEF**

KEARA M. WALDRON hereby certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am over the age of 18 and am an associate at the law firm of Lowenstein Sandler LLP (“Lowenstein Sandler”), counsel for the Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Subchapter 98, City of Detroit Retirees.

2. On May 7, 2014, Lowenstein Sandler received the Debtor’s May 6, 2014 document production (the “Production”).

3. In accordance with the Court’s *Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief* [Docket No. 4710] (the “Order”), on May 14, 2014, Lowenstein Sandler sent the Production to the Debtor’s counsel Jones Day at 51 Louisiana Avenue, N.W., Washington, D.C. 20001, Attn: Mary Hale, as specified in the Order, by overnight delivery. A true and correct copy of the May 14, 2014 letter to Mary Hale enclosing the Production is attached hereto as Exhibit “A”.

4. Lowenstein Sandler did not create any electronic or physical copies of the Production or any portion of the Production, nor did Lowenstein Sandler create any work product reflecting the contents of the documents in the Production. Accordingly, Lowenstein

Sandler has complied with the provisions of paragraph 2 of the Court's Order.

The undersigned certifies under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this 14th day of May, 2014

/s/ *Keara Waldron*  
Keara M. Waldron, Esq.

# **EXHIBIT A**

Keara Waldron  
Associate

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May 14, 2014

Mary Hale  
Jones Day  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001

**Re: City of Detroit, Michigan, Case No. 13-53846 (Bankr. E.D. Mich.)**

Dear Ms. Hale:

In accordance with the Bankruptcy Court's *Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* [Docket No. 4710], enclosed please find the hard drive containing the City of Detroit's document production (the "Production") received by Lowenstein Sandler LLP on behalf of the Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees ("AFSCME") on May 7, 2014.

This letter certifies that all electronic copies of the Production in AFSCME's possession have been purged, all physical copies of the Production in AFSCME's possession have been destroyed, and all work-product created reflecting the contents of any document in the Production has been destroyed.

Sincerely,

  
Keara Waldron

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5/14/14 29893052.1

Enclosure(s)